

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

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(1) BRYAN SAMS,
Plaintiff,
v. (1) JOHNSON MATTHEY, INC,
d/b/a Tracerco
Et. Al.,
Defendants.

24-CV-00602-CVE-SH

JOINT NOTICE OF SETTLEMENT

TO THE HONORABLE COURT:

Plaintiff Bryan Sams (“Sams”) and Defendants 1. Johnson Matthey, Inc. d/b/a Tracerco (“J-M”), 2. University of Tulsa (“TU”), 3. Chevron USA, Inc. (“Chevron”), and 4. Chase Environmental Group, Inc. (“Chase”) (collectively, the “Parties”) submit this Joint Notice of Settlement and advise the Court as follows: The Parties have reached a mediated agreement that will settle all remaining disputes between them and request that the Court enter its order giving them until May 30th 2025 to file their joint stipulation of dismissal. Defendant China Institute of Atomic Energy (“PRC”) remains unserved and, at such time as said Joint Stipulation of Dismissal is filed, Plaintiff shall dismiss PRC pursuant to FRCP 41(a)(1)(A) by separate dismissal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This certifies that on April 25, 2025, a true and correct copy of the foregoing document was served via the Court's ECF system upon all counsel of record who are registered ECF users or by another manner authorized by Rule 5(b)(2) of the Federal Rules of Civil procedure.

/s/ G. Gene Thompson

G. Gene Thompson, *Attorney at Law*